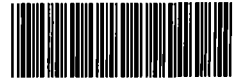




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029



SDMS DocID

2095145

July 25, 2005

Ms. Chris Ann Gahagan
Enlibra LLC
5402 Pleasant Grove Lane
Midlothian, VA 23112

RE: BALLY GROUND WATER CONTAMINATION SUPERFUND SITE

Ms. Gahagan:

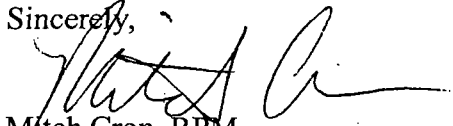
EPA is in receipt of the document titled, "Facility Subslab Vapor Analytical results, Former Bally Engineered Structures Facility", dated June 30, 2005. The document was prepared by Arcadis G&M, Inc. (Arcadis).

EPA has the following comments regarding this document:

1. Please clarify the pumping rate of the RAD-7 that was used to purge the tracer gas sample locations and to determine respective radon concentrations. Also, for each tracer gas location, please indicate how long the RAD-7 was operated prior to collecting the subslab vapor samples.
2. In 2004, subslab vapor sample "SW-3" was collected at the same location as the 2005 subslab vapor sample "TG-2". The trichloroethylene (TCE) result for SV-3 (collected 2004) was 13,000 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$). The result for TG-2 (collected 2005) was 290 $\mu\text{g}/\text{m}^3$. Is it possible that the operation of the RAD-7 disrupted the subslab environment prior to subslab vapor sample collection, resulting in the substantially lower TCE result? Also, does this possibility call into question the validity of the analytical result at subslab vapor sample "TG-4"?
3. The subslab vapor sample "TG-5" was collected at the Northwest building. The analytical result for this sample exhibit the highest concentrations of Site-related compounds identified during the vapor intrusion investigation (TCE - 39,000 $\mu\text{g}/\text{m}^3$, 1,1-dichloroethene (DCE) - 79,000 $\mu\text{g}/\text{m}^3$). Is it possible that this area represents an active source of contamination at the Bally Ground Water Contamination Superfund Site? How could this possibility be evaluated?

Please respond to these comments in writing. Please contact me if you have any questions regarding this project at (215) 814-3286.

Sincerely,

A handwritten signature in black ink, appearing to read "Mitch Cron", written over the word "Sincerely,".

Mitch Cron, RPM
Western PA/MD Remedial Branch



Jennifer
Hubbard/R3/USEPA/US
07/06/2005 10:35 AM

To Mitch Cron/R3/USEPA/US@EPA
cc Kathy Davies/R3/USEPA/US@EPA, Patricia
Flores/R3/USEPA/US@EPA
bcc
Subject Bally Subslabs

I have reviewed the results report dated June 30.

While the concentrations on Table 3 would have been easier to verify if the report had included the equations and assumptions, I was able to confirm these numbers for the following assumptions: 20 m3/day inhalation rate, 24 hr/day exposure, 250 days/yr, 25 yrs, 70 kg body weight.

These results suggest that the areas of greatest concern were in the TG-1 and TG-5/55 vicinity.

While the Hazard Index was not addressed in this report, consideration of the HI would still point to TG-1 and TG-5/55 as the areas of potential concern.

The original sample SV-3 was obtained near TG-2. The combination of concentrations and attenuations factors in TG-2 and TG-4 do not indicate a great concern for that part of the building using current data. However, the earlier sample SV-3 had a much higher subslab concentration (13000 ug/m3, vs. the TG-2 concentration of 290 ug/m3). Until the reason for this disparity can be resolved, this area also warrants consideration.

If the attenuation factor of 0.002 applies to the vicinity of SV-1 and SV-2 also, then concerns are reduced for that area. The TG-3 area, which was only sampled once, did not yield results that would warrant great concern (cancer risk at most $1E-5$).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION III
ANALYTICAL SERVICES AND QUALITY ASSURANCE BRANCH
Environmental Science Center
701 Mapes Road
Fort Meade, Maryland 20755-5350

DATE: July 15, 2005

SUBJECT: Bally Groundwater Site (Document # 25107)
Data Validation Report

FROM: Mary Ellen Schultz *meS*
Environmental Scientist
ASQAB/QAT (3EA20)

TO: Mitch Cron, RPM
Western PA Remedial Section (3HS22)

The Summary Report and Data Validation Report prepared by ARCADIS and dated June 30, 2005 have been reviewed.¹ The Data Validation Report narratives show no major problems with the data. Therefore, it is recommended to accept the data for decisions at the Bally Groundwater Site.

The following Sample Delivery Groups (SDG) were reviewed: SDG: 0503549A, SDG: 0503549B, SDG: 0503550A and SDG: 0503550B. The Data Validation Report contained narratives and Laboratory Report Results for all SDGs. Additional support documentation was not included.

If you have any questions, please contact me at (410) 305-2746.

¹ Reviewed for compliance with the *Region III Modifications to the National Functional Guidelines for Organic Data Review, September 1994* and Method TO-15.



ARCADIS

Infrastructure, environment, buildings

Mr. Mitch Cron
United States Environmental Protection Agency Region III
Hazardous Site Cleanup Division
1650 Arch Street
Philadelphia, PA 19103-2029

Subject:

Facility Subslab Vapor Analytical Results
Former Bally Engineered Structures Facility
Bally Borough, Berks County, Pennsylvania

Dear Mr. Cron:

ARCADIS, on behalf of Sunbeam Products Inc. (Sunbeam), is submitting the following summary that documents the March 22, 23 and 24, 2005 subslab vapor sampling at the former Bally Engineered Structures (BES) facility (Figure 1). The primary objective of the investigation was to refine the understanding of the vapor intrusion pathway beneath the facility. The information gathered during this investigation will ultimately be used to evaluate whether or not site-related constituents, particularly trichloroethene (TCE) present beneath the building slab, pose a potential unacceptable health concern. The scope of work was completed in accordance with ARCADIS's *Soil Vapor Sampling Workplan* dated March 4, 2005.

The following sections provide the details and results of the subslab vapor sampling events.

Field Activities

March 22, 2005 Subslab Vapor Sampling Event

On March 22, 2005 ARCADIS met with representatives of the USEPA at the former BES facility to inspect the sample locations and collect samples. Two of these samples, TG-2 and TG-4, were collected on March 22. Sample locations are presented on Figure 1.

Vapor samples were collected in accordance with the workplan with one modification; a separate purge pump was not used, rather the DurrIDGE RAD-7 Electronic Radon Detector (RAD-7) was used to purge each location. Specifics of the RAD-7 protocol are outlined below:

- The RAD-7 (set to draw air from beneath the slab) was started and allow to take two stabilization readings at five minute intervals prior to the first valid reading. This served as the two liter purge.

Part of a bigger picture

ARCADIS G&M, Inc.
6 Terry Drive
Suite 300
Newtown
Pennsylvania 18940
Tel 267 685 1800
Fax 267 685 1800
www.arcadis-us.com

ENVIRONMENT

Date:
30 June 2005

Contact:
Frank C. Natitus

Phone:
267-685-1833

Email:
fnatitus@arcadis-us.com

Our ref:
NP000597.0006

AR100285

- The RAD-7 was allowed to run until radon readings had stabilized, until radon readings had demonstrated a definitive peak or for 8 five minute cycles.

This represents a slight deviation from the work plan effected to increase efficiency and provide a standardized methodology based upon the actual function of the equipment. Conversations were held with the onsite EPA Representative regarding these changes, and the EPA agreed with the changes and the basis for the changes.

The subslab vapor samples were submitted to Air Toxics Limited for Selective Ion Monitoring (SIM) analysis by TO-15 for the following compounds by GC/MS:

- Vinyl Chloride
- 1,1-Dichloroethane
- 1,1-Dichloroethylene
- cis-1,2,-Dichloroethylene
- 1,1,1-Trichloroethane
- Trichloroethylene

The indoor air was checked at each location with a flame-ionization detector (FID) prior to sampling. The reading at TG-2 was 0.0 parts per million (ppm). The instrument ran out of hydrogen at location TG-4 before a reading could be taken. Upon completion of sample collection, each hole was sealed with concrete caulk/sealant.

March 23, 2004 Soil Vapor Sampling Event

On March 23, 2004, soil vapor samples TG-1, TG-3 and TG-5 were collected from their respective locations (Figure 1). The samples were collected using the same methodology discussed above. A duplicate sample was collected at location TG-5. USEPA personnel were present for the collection of these samples. A malfunction occurred with the sampling equipment at location TG-3 and submission of the sample had to be aborted. It was decided that the sample would be recollected during a separate mobilization.

The indoor air at locations TG-1, TG-3 and TG-5 was checked with a flame-ionization detector (FID) prior to sampling. At locations TG-3 and TG-5 the FID reading was 0.0 ppm. At location TG-1 a maximum reading of 2.3 ppm was noted; however, a propane-powered forklift was operating in the vicinity and the peak was noted immediately after the forklift passed. Upon completion of sample collection, each hole was sealed with concrete caulk/sealant.

March 24, 2004 Soil Vapor Sampling Event

On March 24, 2004, ARCADIS remobilized to re-collect subslab vapor sample TG-3. This sample was collected from the location shown on Figure 1. The sample was

collected using the same methodology discussed above. USEPA personnel were not present for the collection of this sample.

Results and Discussion

The five samples were submitted to Air Toxics for SIM analysis by TO-15 for vinyl chloride, 1,1-Dichloroethane, 1,1-Dichloroethylene, cis-1,2,-Dichloroethylene, 1,1,1-Trichloroethane, and trichloroethylene analysis. Two of the samples (TG-1 and TG-5) exhibited VOC concentrations in excess of the SIM instrument's calibration range and were subsequently analyzed by the standard TO-15 methodology. The results of the analyses are presented on Figure 1 and in Table 1. Table 2 presents the sub-slab and indoor air radon concentrations and resulting attenuation factors. Table 3 presents a matrix of subslab TCE concentrations based on area specific attenuation factors, varying TCE toxicological values, and varying risk ranges.

Level IV data deliverables were produced for the analyzed samples. The deliverables were validated by ARCADIS. The validation report is presented in Attachment 1 to this letter.


Sunbeam and ARCADIS would like to meet with you to discuss these results and the next phase of activities at the facility. If you have any questions or comments regarding this sampling letter, please contact Frank Natitus at (267) 685-1833.

Sincerely,

ARCADIS G&M, Inc.



Christopher Sharpe
Staff Scientist



Frank C. Natitus, P.E.
Senior Engineer

Attachments

Copies:

Chris Ann Gahagan
Lorelei Borland
Michael Bedard

ARCADIS

Table 1. SubSlab VOC Results Determined from Site Specific Attenuation Factor Investigation March 2005,
Former BES Facility Bally, Pennsylvania

| Compound | TG-1 | TG-2 | Analytical Results | | TG-5 | TG-55 |
|----------------|--------|-------|--------------------|--------|--------|--------|
| | | | TG-3 | TG-4 | | |
| TCE | 17,000 | 290 | 9.6 | 2.0 | 35,000 | 39,000 |
| 1,1-DCE | 34 J | <0.72 | <0.063 | <0.071 | 66,000 | 79,000 |
| 1,1-DCA | <35 | <0.74 | <0.13 | <0.14 | <110 | <120 |
| cis-1,2 DCE | <35 | <0.72 | <0.12 | <0.14 | <110 | <120 |
| 1,1,1-TCA | <48 | <1.0 | 0.95 | 0.29 | 47,000 | 52,000 |
| Vinyl Chloride | <22 | <0.47 | <0.040 | <0.046 | <36 | <37 |

Notes:

All are units given in ug/m³

<35 = compound was not detected in excess of specified reporting limits

J = estimated concentration

TG-55 is a duplicate sample for location TG-5

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Table 2. Radon Concentrations Determined from Site Specific Attenuation Factor
Investigation March 2005, Former BES Facility Bally, Pennsylvania

| Location ID | Indoor Air | | | | Sub Slab | AF |
|----------------|-------------------------------|--------------------|----------------------|------|--------------------|-------|
| | Charcoal Cannister (pCi/L) | RAD-7 ¹ | CRM-392 ² | Mean | RAD-7 ¹ | |
| TG-1 | 1.8 | 0.91 | NC | 1.4 | 763.60 | 0.002 |
| TG-2 | 0.7 | 0.64 | NC | 0.7 | 811.50 | 0.001 |
| TG-3 | 3.7 | 2.32 | 1.9 | 2.6 | 84.35 | 0.03 |
| TG-4 | 2.1 | 1.67 | NC | 1.9 | 110.25 | 0.02 |
| TG-5 | 2.1 | 2.45 | NC | 2.3 | 742.71 | 0.003 |

Notes

- All units are in pCi/L unless otherwise noted.
- pCi/L PicoCuries per liter
- ¹ Average reading excluding first 2 cycles per manufacturers instructions
- ² Average Reading
- AF Attenuation Factor = Mean Indoor Air Concentration/Subslab Concentration; per workplan.
- NC Data not collected with this instrument

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Table 3. TCE Concentration Matrix
Former BES Facility, Bally, Pennsylvania

| TG-1 Subslab TCE Concentration 17,000 (AF = 0.002) | | Target Risk | |
|---|----------|-------------|----------|
| CSFs | 1.00E-06 | 1.00E-05 | 1.00E-04 |
| 0.4 | 18 | 180 | 1800 |
| 0.09 | 79 | 790 | 7900 |
| 0.02 | 360 | 3600 | 36000 |

| TG-2 Subslab TCE Concentration 290 (AF = 0.001) | | Target Risk | |
|--|----------|-------------|----------|
| CSFs | 1.00E-06 | 1.00E-05 | 1.00E-04 |
| 0.4 | 36 | 360 | 3600 |
| 0.09 | 160 | 1600 | 16000 |
| 0.02 | 720 | 7200 | 72000 |

| TG-3 Subslab TCE Concentration 9.6 (AF = 0.03) | | Target Risk | |
|---|----------|-------------|----------|
| CSFs | 1.00E-06 | 1.00E-05 | 1.00E-04 |
| 0.4 | 1.2 | 12 | 120 |
| 0.09 | 5.3 | 53 | 530 |
| 0.02 | 24 | 240 | 2400 |

| TG-4 Subslab TCE Concentration 2.0 (AF = 0.02) | | Target Risk | |
|---|----------|-------------|----------|
| CSFs | 1.00E-06 | 1.00E-05 | 1.00E-04 |
| 0.4 | 1.8 | 18 | 180 |
| 0.09 | 7.9 | 79 | 790 |
| 0.02 | 36 | 360 | 3600 |

| TG-5 Subslab TCE Concentration 39,000 (AF = 0.003) | | Target Risk | |
|---|----------|-------------|----------|
| CSFs | 1.00E-06 | 1.00E-05 | 1.00E-04 |
| 0.4 | 12 | 120 | 1200 |
| 0.09 | 53 | 530 | 5300 |
| 0.02 | 240 | 2400 | 24000 |

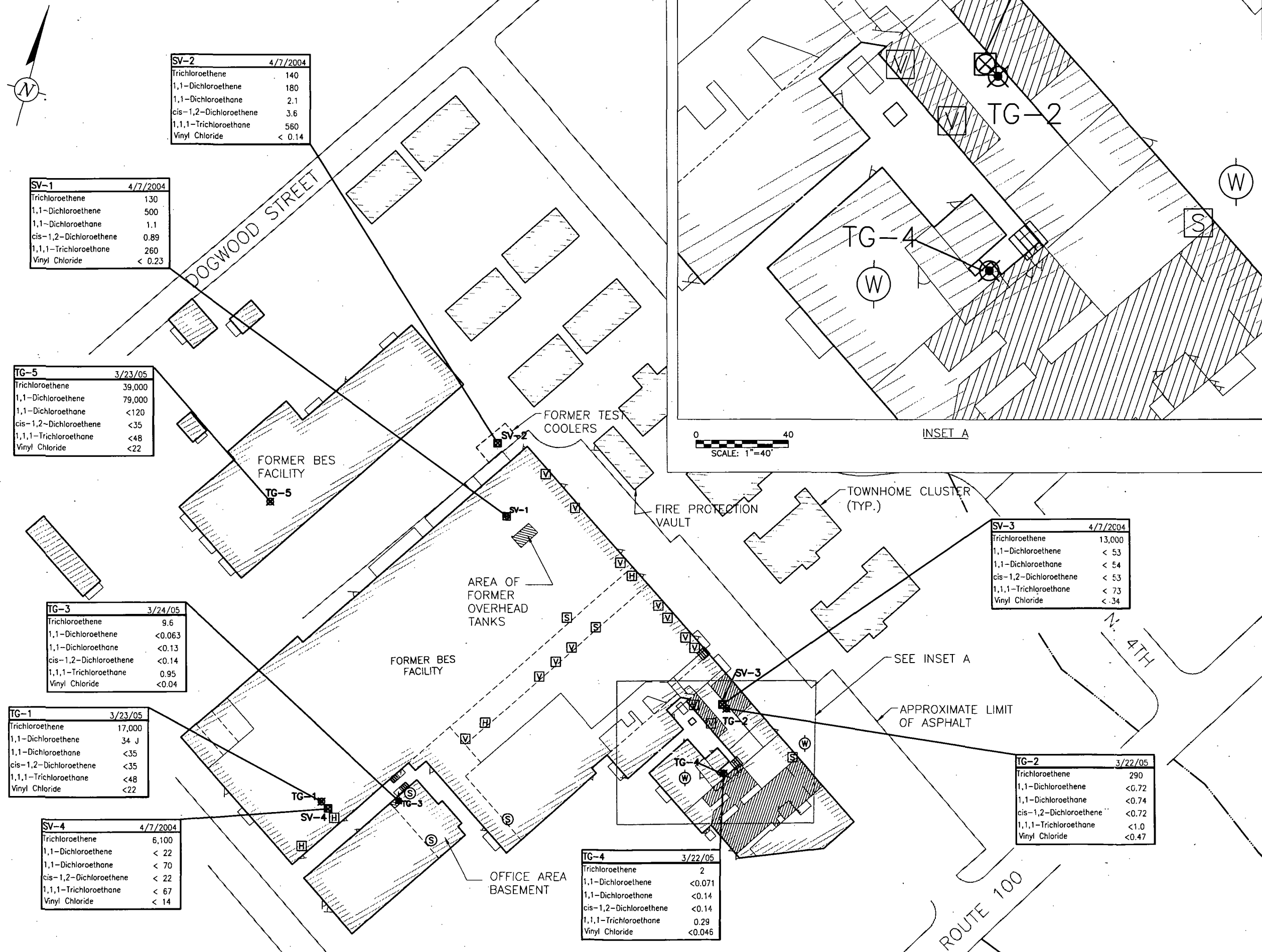
Notes:

all concentration values are in micrograms per cubic meter

AF Attenuation Factor

CSF Cancer Slope Factor

G:\PROJECT\AH Bally, PA\CADD\VAPOR INTRUSION\2005_Facility Sampling Results\Final\FIG-1 SUBSLAB VAPOR SUBSLAB SAMPLE LOCATIONS 030705.DWG 5/27/2005 - 3:37:45 PM Layout: SUBSLAB



copyright © 20_04

LEGEND:

- TG-3** PROPOSED TRACER GAS SAMPLE LOCATION
- SV-1** SUBSLAB VAPOR SAMPLE LOCATION (MARCH/APRIL 2004)
- V** STREAM
- H** VENT OR VENT FAN
- S** OVERHEAD HEATING UNIT
- S** SPRINKLER LINE THROUGH FLOOR
- W** WATER LINE
- W** WOOD FLOOR UNDERLAIN BY CONCRETE
- S** STORM DRAIN
- S** SUMP

NOTE:

ALL CONCENTRATIONS IN ug/m³

| NO. | DATE | REVISION DESCRIPTION | BY |
|-----|------|----------------------|-----|
| | | | CKD |

SUNBEAM PRODUCTS, INC.
BALLY GROUNDWATER SITE

BALLY BOROUGH
BERKS COUNTY, PENNSYLVANIA

FORMER BES FACILITY
SUBSLAB SAMPLE RESULTS
2004 AND MARCH 2005



6 Terry Drive
Suite 300, Newtown, Pa 18940
Tel: 267/685-1800 Fax: 267/685-1801

0 120
SCALE: 1"=120'

| | |
|--------------------------------|---------------------------------|
| PROJECT MANAGER M. BEDARD | DEPARTMENT MANAGER M. BEDARD |
| LEAD DESIGN PROF. F. NATTUS | CHECKED F. NATTUS |
| DRAWN M. WASILEWSKI | DATE 1/21/05 |
| PROJECT NUMBER NP000597.006 | DRAWING NUMBER 1 |

**DATA VALIDATION OF
VAPOR SAMPLES
COLLECTED FROM BALLY,
PENNSYLVANIA IN MARCH
2005**

30 June 2005

REVIEWED BY DONNA M. BROWN
PROJECT SCIENTIST II

| | |
|---|----------|
| Data Validation Narrative for SDG 0503549A | 1 |
| Overview for SDG 0503549A | 1 |
| Summary for SDG 0503549A | 1 |
| Major Problems for SDG 0503549A | 1 |
| Minor Problems for SDG 0503549A | 1 |
| Notes for SDG 0503549A | 1 |
| Report Content Statement for SDG 0503549A | 1 |
| Data Validation Narrative for SDG 0503549B | 2 |
| Overview for SDG 0503549B | 2 |
| Summary for SDG 0503549B | 2 |
| Major Problems for SDG 0503549B | 2 |
| Minor Problems for SDG 0503549B | 2 |
| Notes for SDG 0503549B | 2 |
| Report Content Statement for SDG 0503549B | 3 |
| Data Validation Narrative for SDG 0503550A | 3 |
| Overview for SDG 0503550A | 3 |
| Summary for SDG 0503550A | 3 |
| Major Problems for SDG 0503550A | 3 |
| Minor Problems for SDG 0503550A | 3 |
| Notes for SDG 0503550A | 3 |
| Report Content Statement for SDG 0503550A | 4 |
| Data Validation Narrative for SDG 0503550B | 4 |
| Overview for SDG 0503550B | 4 |
| Summary for SDG 0503550B | 4 |
| Major Problems for SDG 0503550B | 4 |
| Minor Problems for SDG 0503550B | 4 |

| | |
|---|---|
| Notes for SDG 0503550B | 5 |
| Report Content Statement for SDG 0503550B | 5 |

Appendices

- A Glossary of Data Qualifiers for all SDGs, Not Applicable
- B Data Summary Forms by SDG, Not Applicable
- C Laboratory Report Results by SDG
- D Laboratory Report TICs, Not Analyzed
- E Support Documents by SDG, Not Applicable

Data Validation Narrative for SDG 0503549A**Overview for SDG 0503549A**

The samples were sent to Air Toxic Ltd, located in Folsom, California for analysis. The samples were analyzed for selected volatile organic compounds (VOCs) by modified United States Environmental Protection Agency (USEPA) method TO-15 GC/MS full scan.

A sample (TG-2 and laboratory did a duplicate on this sample) was collected on March 22, 2005.

Summary for SDG 0503549A

The QC presented in SDG 0503549A is acceptable with no qualification of the data necessary.

Major Problems for SDG 0503549A

None.

Minor Problems for SDG 0503549A

None.

Notes for SDG 0503549A

Data were analyzed within holding time requirements. An initial calibration and continuing calibration were analyzed and were within QC limits. The surrogate spikes and internal standard were within QC limits. The laboratory control samples and instrument performance checks were within QC limits. Target compounds were not detected in the laboratory blank.

Report Content Statement for SDG 0503549A

Validation of the VOCs data was performed following guidance from the Region III Modifications to National Functional Guideline for Organic Data Review Multi-Media, Multi-Concentration (September 1994) and Innovative Approaches to Data Validation (June 1995) Level M3.

Data Validation Narrative for SDG 0503549B**Overview for SDG 0503549B**

The samples were sent to Air Toxic Ltd, located in Folsom, California for analysis. The samples were analyzed for selected volatile organic compounds (VOCs) by modified United States Environmental Protection Agency (USEPA) method TO-15 GC/MS SIM.

Three samples (TG-4, TG-5, and TG-55 [field duplicate]) were collected on March 22 and 23, 2005.

Summary for SDG 0503549B

The QC presented in SDG 0503549B is acceptable with no qualification of the data necessary.

Major Problems for SDG 0503549B

None.

Minor Problems for SDG 0503549B

The Region III Modifications to National Functional Guideline for Organic Data Review Multi-Media, Multi-Concentration (September 1994) requires that percent difference (%D) be less than 25%, however the TO-15 method requires the %D to be less than 30%. 1,1-Dichloroethene was above the 25 %D but less than the 30 %D therefore no qualification of the data was necessary.

Notes for SDG 0503549B

Data were analyzed within holding time requirements. An initial calibration and continuing calibration were analyzed and were within QC limits. The surrogate spikes and internal standard were within QC limits. The laboratory control samples and instrument performance checks were within QC limits. Target compounds were not detected in the laboratory blank.

Report Content Statement for SDG 0503549B

Validation of the VOCs data was performed following guidance from the Region III Modifications to National Functional Guideline for Organic Data Review Multi-Media, Multi-Concentration (September 1994) and Innovative Approaches to Data Validation (June 1995) Level M3.

Data Validation Narrative for SDG 0503550A**Overview for SDG 0503550A**

The samples were sent to Air Toxic Ltd, located in Folsom, California for analysis. The samples were analyzed for selected volatile organic compounds (VOCs) by modified United States Environmental Protection Agency (USEPA) method TO-15 GC/MS full scan.

A sample (TG-1) was collected on March 23, 2005.

Summary for SDG 0503550A

The QC presented in SDG 0503550A is acceptable with no qualification of the data necessary.

Major Problems for SDG 0503550A

None.

Minor Problems for SDG 0503550A

None.

Notes for SDG 0503550A

Data were analyzed within holding time requirements. An initial calibration and continuing calibration were analyzed and were within QC limits. The surrogate spikes and internal standard were within QC limits. The laboratory control samples and

instrument performance checks were within QC limits. Target compounds were not detected in the laboratory blank.

Report Content Statement for SDG 0503550A

Validation of the VOCs data was performed following guidance from the Region III Modifications to National Functional Guideline for Organic Data Review Multi-Media, Multi-Concentration (September 1994) and Innovative Approaches to Data Validation (June 1995) Level M3.

Data Validation Narrative for SDG 0503550B**Overview for SDG 0503550B**

The samples were sent to Air Toxic Ltd, located in Folsom, California for analysis. The samples were analyzed for selected volatile organic compounds (VOCs) by modified United States Environmental Protection Agency (USEPA) method TO-15 GC/MS SIM.

A sample (TG-3) was collected on March 24, 2005.

Summary for SDG 0503550B

The QC presented in SDG 0503550B is acceptable with no qualification of the data necessary.

Major Problems for SDG 0503550B

None.

Minor Problems for SDG 0503550B

None.

Notes for SDG 0503550B

Data were analyzed within holding time requirements. An initial calibration and continuing calibration were analyzed and were within QC limits. The surrogate spikes and internal standard were within QC limits. The laboratory control samples and instrument performance checks were within QC limits. Target compounds were not detected in the laboratory blank.

Report Content Statement for SDG 0503550B

Validation of the VOCs data was performed following guidance from the Region III Modifications to National Functional Guideline for Organic Data Review Multi-Media, Multi-Concentration (September 1994) and Innovative Approaches to Data Validation (June 1995) Level M3.

ARCADIS

Appendix A

**Glossary of Data Qualifiers
for all SDGs,
Not Applicable**

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Appendix B

**Data Summary Forms by
SDG, Not Applicable**

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Appendix C

**Laboratory Report Results
by SDG**

AIR TOXICS LTD.

SAMPLE NAME: TG-1

ID#: 0503550A-01A

MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

| | | | |
|--------------|---------|---------------------|-----------------|
| File Name: | 7040808 | Date of Collection: | 3/23/05 |
| Dil. Factor: | 87.5 | Date of Analysis: | 4/8/05 05:16 PM |

| Compound | Rpt. Limit (ppbv) | Amount (ppbv) | Rpt. Limit (uG/m3) | Amount (uG/m3) |
|--------------------|----------------------|------------------|-----------------------|-------------------|
| 1,1-Dichloroethene | 8.8 | 8.7 J | 35 | 34 J |
| Trichloroethene | 8.8 | 3200 | 47 | 17000 |

Container Type: 6 Liter Summa Canister (100% Certified)

AIR TOXICS LTD.

SAMPLE NAME: TG-1

ID#: 0503550A-01A

MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

| | | | |
|--------------|---------|---------------------|-----------------|
| File Name: | 7040808 | Date of Collection: | 3/23/05 |
| Dil. Factor: | 87.5 | Date of Analysis: | 4/8/05 05:16 PM |

| Compound | Rpt. Limit (ppbv) | Amount (ppbv) | Rpt. Limit (uG/m3) | Amount (uG/m3) |
|------------------------|----------------------|------------------|-----------------------|-------------------|
| Vinyl Chloride | 8.8 | Not Detected | 22 | Not Detected |
| 1,1-Dichloroethene | 8.8 | 8.7 J | 35 | 34 J |
| 1,1-Dichloroethane | 8.8 | Not Detected | 35 | Not Detected |
| cis-1,2-Dichloroethene | 8.8 | Not Detected | 35 | Not Detected |
| 1,1,1-Trichloroethane | 8.8 | Not Detected | 48 | Not Detected |
| Trichloroethene | 8.8 | 3200 | 47 | 17000 |

J = Estimated value.

Container Type: 6 Liter Summa Canister (100% Certified)

| Surrogates | %Recovery | Method Limits |
|-----------------------|-----------|------------------|
| 1,2-Dichloroethane-d4 | 88 | 70-130 |
| Toluene-d8 | 102 | 70-130 |
| 4-Bromofluorobenzene | 88 | 70-130 |

AIR TOXICS LTD.

SAMPLE NAME: TG-2

ID#: 0503549A-01A

MODIFIED EPA METHOD TO-15 GC/MS FULL SCAN

| | | | |
|--------------|---------|---------------------|-----------------|
| File Name: | 7040722 | Date of Collection: | 3/22/05 |
| Dil. Factor: | 1.83 | Date of Analysis: | 4/8/05 06:14 AM |

| Compound | Rpt. Limit (ppbv) | Amount (ppbv) | Rpt. Limit (uG/m3) | Amount (uG/m3) |
|------------------------|----------------------|------------------|-----------------------|-------------------|
| Vinyl Chloride | 0.18 | Not Detected | 0.47 | Not Detected |
| 1,1-Dichloroethene | 0.18 | Not Detected | 0.72 | Not Detected |
| 1,1-Dichloroethane | 0.18 | Not Detected | 0.74 | Not Detected |
| cis-1,2-Dichloroethene | 0.18 | Not Detected | 0.72 | Not Detected |
| 1,1,1-Trichloroethane | 0.18 | Not Detected | 1.0 | Not Detected |
| Trichloroethene | 0.18 | 54 | 0.98 | 290 |

Container Type: 6 Liter Summa Canister (100% Certified)

| Surrogates | %Recovery | Method Limits |
|-----------------------|-----------|------------------|
| 1,2-Dichloroethane-d4 | 90 | 70-130 |
| Toluene-d8 | 104 | 70-130 |
| 4-Bromofluorobenzene | 93 | 70-130 |

AIR TOXICS LTD.

SAMPLE NAME: TG-3

ID#: 0503550B-02A

MODIFIED EPA METHOD TO-15 GC/MS SIM

| | | | |
|--------------|---------|---------------------|-----------------|
| File Name: | 6040514 | Date of Collection: | 3/24/05 |
| Dil. Factor: | 1.58 | Date of Analysis: | 4/5/05 07:37 PM |

| Compound | Rpt. Limit (ppbv) | Amount (ppbv) | Rpt. Limit (uG/m3) | Amount (uG/m3) |
|------------------------|----------------------|------------------|-----------------------|-------------------|
| Vinyl Chloride | 0.016 | Not Detected | 0.040 | Not Detected |
| 1,1-Dichloroethene | 0.016 | Not Detected | 0.063 | Not Detected |
| 1,1-Dichloroethane | 0.032 | Not Detected | 0.13 | Not Detected |
| cis-1,2-Dichloroethene | 0.032 | Not Detected | 0.12 | Not Detected |
| 1,1,1-Trichloroethane | 0.032 | 0.17 | 0.17 | 0.95 |
| Trichloroethene | 0.032 | 1.8 | 0.17 | 9.6 |

Container Type: 6 Liter Summa Canister (SIM Certified)

| Surrogates | %Recovery | Method Limits |
|-----------------------|-----------|------------------|
| 1,2-Dichloroethane-d4 | 114 | 70-130 |
| Toluene-d8 | 99 | 70-130 |
| 4-Bromofluorobenzene | 101 | 70-130 |

AIR TOXICS LTD.

SAMPLE NAME: TG-4

ID#: 0503549B-02A

MODIFIED EPA METHOD TO-15 GC/MS SIM

| | | | |
|--------------|---------|---------------------|------------------|
| File Name: | 8033020 | Date of Collection: | 3/22/05 |
| Dil. Factor: | 1.79 | Date of Analysis: | 3/30/05 10:12 PM |

| Compound | Rpt. Limit (ppbv) | Amount (ppbv) | Rpt. Limit (uG/m3) | Amount (uG/m3) |
|-----------------------|----------------------|------------------|-----------------------|-------------------|
| 1,1,1-Trichloroethane | 0.036 | 0.053 | 0.20 | 0.29 |
| Trichloroethene | 0.036 | 0.38 | 0.19 | 2.0 |

Container Type: 6 Liter Summa Canister (SIM Certified)

AIR TOXICS LTD.

SAMPLE NAME: TG-5

ID#: 0503549B-03A

MODIFIED EPA METHOD TO-15 GC/MS SIM

| | | | |
|--------------|---------|---------------------|------------------|
| File Name: | 8033117 | Date of Collection: | 3/23/05 |
| Dil. Factor: | 1400 | Date of Analysis: | 3/31/05 08:36 PM |

| Compound | Rpt. Limit (ppbv) | Amount (ppbv) | Rpt. Limit (uG/m3) | Amount (uG/m3) |
|-----------------------|----------------------|------------------|-----------------------|-------------------|
| 1,1-Dichloroethene | 14 | 17000 | 56 | 66000 |
| 1,1,1-Trichloroethane | 28 | 8700 | 150 | 47000 |
| Trichloroethene | 28 | 6500 | 150 | 35000 |

Container Type: 6 Liter Summa Canister (SIM Certified)

AIR TOXICS LTD.

SAMPLE NAME: TG-55

ID#: 0503549B-04A

MODIFIED EPA METHOD TO-15 GC/MS SIM

| | | | |
|--------------|---------|---------------------|------------------|
| File Name: | 8033116 | Date of Collection: | 3/23/05 |
| Dil. Factor: | 1460 | Date of Analysis: | 3/31/05 07:10 PM |

| Compound | Rpt. Limit (ppbv) | Amount (ppbv) | Rpt. Limit (uG/m3) | Amount (uG/m3) |
|-----------------------|----------------------|------------------|-----------------------|-------------------|
| 1,1-Dichloroethene | 15 | 20000 | 58 | 79000 |
| 1,1,1-Trichloroethane | 29 | 9500 | 160 | 52000 |
| Trichloroethene | 29 | 7200 | 160 | 39000 |

Container Type: 6 Liter Summa Canister (SIM Certified)

AIR TOXICS LTD.

SAMPLE NAME: TG-4

ID#: 0503549B-02A

MODIFIED EPA METHOD TO-15 GC/MS SIM

| | | | |
|--------------|---------|---------------------|------------------|
| File Name: | 8033020 | Date of Collection: | 3/22/05 |
| Dil. Factor: | 1.79 | Date of Analysis: | 3/30/05 10:12 PM |

| Compound | Rpt. Limit (ppbv) | Amount (ppbv) | Rpt. Limit (uG/m3) | Amount (uG/m3) |
|------------------------|----------------------|------------------|-----------------------|-------------------|
| Vinyl Chloride | 0.018 | Not Detected | 0.046 | Not Detected |
| 1,1-Dichloroethene | 0.018 | Not Detected | 0.071 | Not Detected |
| 1,1-Dichloroethane | 0.036 | Not Detected | 0.14 | Not Detected |
| cis-1,2-Dichloroethene | 0.036 | Not Detected | 0.14 | Not Detected |
| 1,1,1-Trichloroethane | 0.036 | 0.053 | 0.20 | 0.29 |
| Trichloroethene | 0.036 | 0.38 | 0.19 | 2.0 |

Container Type: 6 Liter Summa Canister (SIM Certified)

| Surrogates | %Recovery | Method Limits |
|-----------------------|-----------|------------------|
| 1,2-Dichloroethane-d4 | 118 | 70-130 |
| Toluene-d8 | 102 | 70-130 |
| 4-Bromofluorobenzene | 113 | 70-130 |

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Appendix D

**Laboratory Report TICs, Not
Analyzed**

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Appendix E

**Support Documentation by
SDG, Not Applicable**